

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**STATUS UPDATE, STIPULATION,  
AND [PROPOSED ORDER]  
REGARDING PLAINTIFFS' AND  
YOUTUBE'S DMCS RIPE DISPUTES  
ISSUES 2 AND 3**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

1 Defendants YouTube, LLC and Google, LLC (together, “Defendants”), and PI/SD  
 2 Plaintiffs (collectively, the “Parties”), respectfully submit this update and stipulation to the Court:

3 WHEREAS, a Discovery Case Management Conference is scheduled before this Court on  
 4 October 24, 2024.

5 WHEREAS, on October 18, 2024, the Parties filed a Discovery Case Management  
 6 Statement, providing the Court with discovery updates, including ripe discovery disputes. With  
 7 respect to Defendants YouTube and Google, the Parties raised, among other things, Ripe Dispute  
 8 No. 2 [*YouTube’s Amended Responses or Confirmation in Writing of Agreements Reached by*  
 9 *Parties*], and Ripe Dispute No. 3 [*YouTube’s Search of Non-Custodial Sources Identified by PI/SD*  
 10 *Plaintiffs*]. The Parties provided their substantive positions on Ripe Dispute No. 2 in the Discovery  
 11 Case Management Statement and reported that they intended to file a joint letter brief on Ripe  
 12 Dispute No. 3 by October 22, 2024, so that both issues could be considered by the Court at the  
 13 October 24, 2024, conference.

14 WHEREAS, the Parties have continued their discussions on both issues and have reached  
 15 an agreement that they believe will resolve those issues or inform the scope of any remaining  
 16 disputes on those issues.

17 NOW AND THEREFORE, the Parties respectfully request that the Court defer decision  
 18 on Ripe Dispute No. 2 so that the Parties can engage in further meet and confers, and that the Court  
 19 adopts the following schedule to ensure timely and efficient briefing of this issues:

- 20       a.      No later than October 25, 2024, by 5PM PT, Defendants will provide to Plaintiffs,  
                  in writing, agreed upon information regarding its search of non-custodial sources;
- 21       b.      No later than October 29, 2024, the Parties will hold a meet and confer on Ripe  
                  Dispute Nos. 2 and 3;
- 22       c.      No later than November 1, 2024, by 5PM PT, Plaintiffs will identify to Defendants,  
                  in writing, any remaining issues as to Ripe Disputes Nos. 2 and 3;
- 23       d.      No Later than November 6, 2024, by 5PM PT, Defendants will provide to Plaintiffs,  
                  in writing, substantive responses to remaining issues on Ripe Dispute Nos. 2 and 3;

- e. No later than November 8, 2024, the Parties will hold an H(2) on any remaining issues on Ripe Dispute Nos. 2 and 3; and,
- f. No later than November 15, 2024, the Parties will file joint letter briefs as to any remaining issues on Ripe Dispute Nos. 2 and 3, so that the Court may consider the briefs at the next Discovery Case Management Conference.
- g. The Parties agree to meet and confer in good faith at Plaintiffs' reasonable request for information regarding YouTube's search and production from non-custodial sources newly identified by Plaintiffs in YouTube's document production that appear likely to contain relevant information or in response to an identified deficiency. Plaintiffs agree that they will be reasonable and judicious in making any such requests.

**IT IS SO STIPULATED AND AGREED,**

DATED: October 22, 2024

# **WILSON SONSINI GOODRICH & ROSATI**

## Professional Corporation

By: /s/ Lauren Gallo White  
Lauren Gallo White (State Bar No. 309075)  
Samantha A. Machock (State Bar No. 298852)  
WILSON SONSINI GOODRICH & ROSATI PC  
One Market Plaza, Spear Tower, Suite 3300  
San Francisco, CA 94105  
Telephone: (415) 947-2000  
Facsimile: (415) 947-2099  
Email: lwhite@wsgr.com  
Email: smachock@wsgr.com

Brian M. Willen (*pro hac vice*)  
WILSON SONSINI GOODRICH & ROSATI PC  
1301 Avenue of the Americas, 40th Floor  
New York, New York 10019  
Telephone: (212) 999-5800  
Facsimile: (212) 999-5899  
Email: bwillen@wsgr.com

Christopher Chiou (State Bar No. 233587)  
Matthew K. Donohue (State Bar No. 302144)  
WILSON SONSINI GOODRICH & ROSATI PC  
953 East Third Street, Suite 100

1 Los Angeles, CA 90013  
 2 Telephone: (323) 210-2900  
 3 Facsimile: (866) 974-7329  
 Email: cchiou@wsgr.com  
 Email: mdonohue@wsgr.com

4 *Attorneys for Defendants YouTube, LLC and*  
*Google LLC*  
 5

6 DATED: October 22, 2024

7 By: /s/ Lexi J. Hazam  
 LEXI J. HAZAM  
**LIEFF CABRASER HEIMANN &**  
**BERNSTEIN, LLP**  
 8 275 Battery Street, 29<sup>th</sup> Floor  
 San Francisco, CA 94111-3339  
 Telephone: 415-956-1000  
 lhazam@lchb.com

9  
 PREVIN WARREN  
**MOTLEY RICE LLC**  
 10 401 9th Street NW Suite 630  
 Washington DC 20004  
 Telephone: 202-386-9610  
 pwarren@motleyrice.com

11 Co-Lead Counsel

12 CHRISTOPHER A. SEEGER  
**SEEGER WEISS, LLP**  
 13 55 Challenger Road, 6<sup>th</sup> floor  
 Ridgefield Park, NJ 07660  
 Telephone: 973-639-9100  
 Facsimile: 973-679-8656  
 cseeger@seegerweiss.com

14 Counsel to Co-Lead Counsel and Settlement  
 Counsel

15 JENNIE LEE ANDERSON  
**ANDRUS ANDERSON, LLP**  
 16 155 Montgomery Street, Suite 900  
 San Francisco, CA 94104  
 Telephone: 415-986-1400  
 jennie@andrusanderson.com

17 Liaison Counsel

18 JOSEPH G. VANZANDT  
**BEASLEY ALLEN CROW METHVIN**  
**PORTIS & MILES, P.C.**  
 19 234 Commerce Street  
 Montgomery, AL 36103  
 Telephone: 334-269-2343  
 joseph.vanzandt@beasleyallen.com

EMILY C. JEFFCOTT  
**MORGAN & MORGAN**  
220 W. Garden Street, 9<sup>th</sup> Floor  
Pensacola, FL 32502  
Telephone: 850-316-9100  
[ejeffcott@forthepeople.com](mailto:ejeffcott@forthepeople.com)

## Federal/State Liaison Counsel

**MATTHEW BERGMAN  
SOCIAL MEDIA VICTIMS LAW CENTER**  
821 Second Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: 206-741-4862  
[matt@socialmediavictims.org](mailto:matt@socialmediavictims.org)

JAMES J. BILSBORROW  
**WEITZ & LUXENBERG, PC**  
700 Broadway  
New York, NY 10003  
Telephone: 212-558-5500  
Facsimile: 212-344-5461  
[jbilsborrow@weitzlux.com](mailto:jbilsborrow@weitzlux.com)

**JAYNE CONROY**  
**SIMMONS HANLY CONROY, LLC**  
112 Madison Ave, 7<sup>th</sup> Floor  
New York, NY 10016  
Telephone: 917-882-5522  
[jconroy@simmonsfirm.com](mailto:jconroy@simmonsfirm.com)

ANDRE MURA  
**GIBBS LAW GROUP, LLP**  
1111 Broadway, Suite 2100  
Oakland, CA 94607  
Telephone: 510-350-9717  
amm@classlawgroup.com

**ALEXANDRA WALSH  
WALSH LAW**  
1050 Connecticut Ave, NW, Suite 500  
Washington D.C. 20036  
Telephone: 202-780-3014  
[awalsh@alexwalshlaw.com](mailto:awalsh@alexwalshlaw.com)

**MICHAEL M. WEINKOWITZ  
LEVIN SEDRAN & BERMAN, LLP**  
510 Walnut Street Suite 500  
Philadelphia, PA 19106  
Telephone: 215-592-1500  
[mweinkowitz@lfsbalw.com](mailto:mweinkowitz@lfsbalw.com)

## Plaintiffs' Steering Committee Leadership

1 RON AUSTIN  
 2 **RON AUSTIN LAW**  
 3 400 MANHATTAN BLVD  
 HARVEY, LA 70058  
 Telephone: 504-227-8100  
 4 raustin@ronaustinlaw.com

5 PAIGE BOLDT  
 6 **WATTS GUERRA LLP**  
 7 4 Dominion Drive, Bldg. 3, Suite 100  
 San Antonio, TX 78257  
 Telephone: 210-448-0500  
 PBoldt@WattsGuerra.com

8 THOMAS P. CARTMELL  
 9 **WAGSTAFF & CARTMELL LLP**  
 10 4740 Grand Avenue, Suite 300  
 Kansas City, MO 64112  
 Telephone: 816-701 1100  
 tcartmell@wcllp.com

11 SARAH EMERY  
 12 **HENDY JOHNSON VAUGHN EMERY, PSC**  
 13 2380 Grandview Drive  
 Ft. Mitchell, KY 41017  
 Telephone: 888-606-5297  
 14 semery@justicestartshere.com

15 CARRIE GOLDBERG  
 16 **C.A. GOLDBERG, PLLC**  
 17 16 Court St.  
 Brooklyn, NY 11241  
 Telephone: (646) 666-8908  
 18 carrie@cagoldberglaw.com

19 RONALD E. JOHNSON, JR.  
 20 **HENDY JOHNSON VAUGHN EMERY, PSC**  
 21 600 West Main Street, Suite 100  
 Louisville, KY 40202  
 Telephone: 859-578-4444  
 rjohnson@justicestartshere.com

22 SIN-TING MARY LIU  
 23 **AYLSTOCK WITKIN KREIS &**  
 24 **OVERHOLTZ, PLLC**  
 25 17 East Main Street, Suite 200  
 Pensacola, FL 32502  
 Telephone: 510-698-9566  
 mliu@awkolaw.com

26 JAMES MARSH  
 27 **MARSH LAW FIRM PLLC**  
 28 31 Hudson Yards, 11th floor  
 New York, NY 10001-2170  
 Telephone: 212-372-3030  
 jamesmarsh@marshlaw.com

1  
2 HILLARY NAPPI  
3 **HACH & ROSE LLP**  
4 112 Madison Avenue, 10th Floor  
New York, New York 10016  
Telephone: 212.213.8311  
hnappi@hrsclaw.com

5 EMMIE PAULOS  
6 **LEVIN PAPANTONIO RAFFERTY**  
7 316 South Baylen Street, Suite 600  
Pensacola, FL 32502  
Telephone: 850-435-7107  
epaulos@levinlaw.com

8  
9 RUTH THI RIZKALLA  
10 **THE CARLSON LAW FIRM, P.C.**  
11 1500 Rosecrans Ave., Ste. 500  
Manhattan Beach, CA 90266  
Telephone: 415-308-1915  
rrizkalla@carlsonattorneys.com

12 ROLAND TELLIS  
13 DAVID FERNANDES  
14 **BARON & BUDD, P.C.**  
15 15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436  
Telephone: (818) 839-2333  
Facsimile: (818) 986-9698  
rtellis@baronbudd.com  
dfernandes@baronbudd.com

16  
17 MELISSA YEATES  
18 JOSEPH E. MELTZER  
19 **KESSLER TOPAZ MELTZER & CHECK, LLP**  
20 280 King of Prussia Road  
Radnor, PA 19087  
Telephone: 610-667-7706  
myeates@ktmc.com  
jmeltzer@ktmc.com

21  
22 DIANDRA “FU” DEBROSSE ZIMMERMANN  
23 **DICELLO LEVITT**  
24 505 20<sup>th</sup> St North Suite 1500  
Birmingham, Alabama 35203  
Telephone: 205.855.5700  
fu@dicellosevitt.com

25 Plaintiffs’ Steering Committee Membership  
26  
27 *Attorneys for Plaintiffs*

## **ATTESTATION**

I, Lauren Gallo White, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: October 22, 2024

By: /s/ Lauren Gallo White  
Lauren Gallo White

## ORDER

IT IS SO ORDERED that the foregoing Stipulation is approved:

DATED:

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Hon. Peter H. Kang  
United States District Court Magistrate Judge